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*Attorneys for Defendant
GoodRx Holdings, Inc.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

JANE DOE, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

GOODRX HOLDINGS, INC., CRITEO
CORP., META PLATFORMS, INC., AND
GOOGLE LLC,

Defendants.

CASE NO. 3:23-CV-00501-LB

Magistrate Judge: Laurel Beeler
Courtroom: B, 15th Floor

**JOINT STIPULATION TO EXTEND
TIME FOR DEFENDANT GOODRX
HOLDINGS, INC. TO RESPOND TO
COMPLAINT UNDER L.R. 6-1(A)**

Complaint Filed Date: February 2, 2023

1 Pursuant to Civil Local Rule 6-1(a), Plaintiff Jane Doe (“Plaintiff”) and Defendant GoodRx
2 Holdings, Inc. (“GoodRx”), through their respective attorneys, hereby stipulate as follows:

3 **WHEREAS**, Plaintiff filed her Complaint in this Court on February 2, 2023;

4 **WHEREAS**, GoodRx was served with the summons and Complaint on February 6, 2023;

5 **WHEREAS**, GoodRx has indicated it intends to file a Motion to Compel Arbitration seeking to
6 compel Plaintiff’s claims against GoodRx to arbitration;

7 **WHEREAS**, GoodRx’s response to the Complaint is currently due February 27, 2023;

8 **WHEREAS**, the parties agree that GoodRx shall file the aforementioned Motion to Compel
9 Arbitration on or before April 13, 2023;

10 **WHEREAS**, the parties further agree that Plaintiff shall have until May 26, 2023 to respond to
11 GoodRx’s Motion to Compel Arbitration;

12 **WHEREAS**, the parties further agree that GoodRx shall have until June 16 to file a reply in
13 support of its Motion to Compel Arbitration;

14 **WHEREAS**, the parties agree that GoodRx shall have 30 days from this Court’s decision
15 determining the Motion to Compel Arbitration to answer or otherwise respond to the Complaint,
16 including by filing a Motion to Dismiss;

17 **WHEREAS**, the stipulated extension does not affect the initial case management conference or
18 any other existing date or deadline.

19 Pursuant to Local Rule 6-1(a), IT IS HEREBY STIPULATED AND AGREED by the parties
20 that the last day for GoodRx to answer or otherwise respond to the Complaint and Plaintiff’s time to
21 respond to GoodRx’s answer or response shall be extended as set forth herein.
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1 DATED: February 24, 2023

Respectfully submitted,

/s/ Christian Levis

Robert C. Schubert (SBN 62684)

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-and-

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Attorneys for Plaintiff Jane Doe

20 DATED: February 24, 2023

/s/ Michael J. Shipley

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19 *Attorneys for Defendant GoodRx Holdings, Inc.*

20 I, Michael J. Shipley, am the ECF user whose ID and password are being used to file this Joint
21 Stipulation to Extend Time to Respond to Complaint. In compliance with Civil Local Rule 5-1(h)(3), I
22 hereby attest that Christian Levis has concurred in this filing.

23 DATED: February 24, 2023

24 /s/ Michael J. Shipley

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/s/ Michael J. Shipley